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January 23, 1996

Sherry L. Estes, CS-29A
Office of Regional Counsel
U.S. Environmental Protection Agency
77 W. Jackson
Chicago, Illinois 60604

Re: Stickney Avenue Landfill and Tyler Street Dump Matters
Toledo, Ohio
AP Parts International, Inc./AP Parts Manufacturing Company

Dear Ms. Estes:

By a December 1, 1995 Notice of Liability letter you advised AP Parts International, Inc. that it was a potentially responsible party with respect to the above sites.

AP Parts International, Inc., a Delaware corporation, was incorporated in 1989. AP Parts Manufacturing Company, a Delaware corporation, became a wholly owned subsidiary of AP Parts International at approximately that same time.

AP Parts Manufacturing Company owned and operated the Toledo facility which generated the waste materials allegedly disposed of at the Stickney/Tyler sites. As such, AP Parts Manufacturing Company is the proper potentially responsible party and not AP Parts International, Inc. AP Parts International has no connection with and no liability with respect to these sites. I would ask that the U.S. EPA files reflect the foregoing. While, in accordance with our letter to you of December 4, 1995, we are willing to participate in negotiations with the U.S. EPA concerning these matters, this participation will be on behalf of AP Parts Manufacturing Company and not AP Parts International, Inc.

Very truly yours,

FREEMAN McKENZIE,
a Professional Corporation

Thomas M. Woods

TMW:day

cc: Mr. Thomas Barounis, U.S. EPA HSR-6J
Ms. Jane Montgomery